

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

RICARDO PANNEFLEK

Plaintiff,

v.

MIAMI ALL NETWORK
MARKETING INC.; RENZO
VERASTEGUI; RENATTA G.
VERASTEGUI; DELIVERY DRD
CORP.; NEW LIFE
BROADCASTING INC; ARSO
RADIO CORPORATION; XYZ
CORPORATION; JOHN DOE; JANE
DOE

Defendants

CIVIL NO.: 22-1282 (ADC)

TRADEMARK INFRINGEMENT;
UNFAIR COMPETITION; FALSE
ADVERTISEMENT AND REQUEST
FOR INJUNCTIVE RELIEF

JURY TRIAL

MOTION REQUESTING HEARING ON ORDER TO SHOW CAUSE

TO THE HONORABLE COURT:

COMES NOW plaintiff **Ricardo Panneflek** (“Panneflek” or “Plaintiff”), through the undersigned attorneys who respectfully state and pray as follows:

1. On June 16, 2022, the appearing party filed before this Honorable Court a Verified Complaint and a Memorandum in Support of its Request for Preliminary Injunction.

2. As may be verified in said documents defendants continued unauthorized use of plaintiff's *Collagen 21* registered trademark is causing irreparable harm to plaintiff.

3. As a result, we hereby respectfully request that this Honorable Court enter the order to show cause as to why the preliminary injunction should not issue. *See* Dkt. No. 2-1.

WHEREFORE, it is respectfully requested that this Honorable Court enter the order to show cause as to why the preliminary injunction should not issue. *See* Dkt. No. 2-1.

RESPECTFULLY SUBMITTED

On San Juan, Puerto Rico this 28th day of July 2022.

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